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7 UNITED HEALTH SERVICES, INC., UHS OF DELAWARE,
INC., and VALLEY HEALTH SYSTEM, LLC

8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11

12 ANNALISA CONNELLY,
13 Plaintiff,
14 vs.

15 UNITED HEALTH SERVICES, INC., a
16 Delaware Corporation; UHS OF
17 DELAWARE, INC., a Delaware
Corporation; VALLEY HEALTH
18 SYSTEM LLC; a Delaware Limited
Liability Company,

19 Defendants.

20 CASE NO. 2:16-CV-02235-JAD-VCF

21

22 **STIPULATION AND ORDER TO EXTEND
TIME TO FILE A RESPONSIVE
PLEADING**

23 Plaintiff ANNALISA CONNELLY (“Plaintiff”) and Defendants UNITED HEALTH
24 SERVICES, INC., UHS OF DELAWARE, INC., and VALLEY HEALTH SYSTEM, LLC
25 (“Defendants”), by and through their respective counsel of record, hereby request that the Court
26 extend the deadline for Defendants to file their first responsive pleading, which is currently set for
27 October 18, 2016. The Complaint (ECF No. 1) is based on claims under the Americans with
28 Disabilities Act and is subject to the Early Neutral Evaluation (“ENE”) process set forth in Local
Rule 16-6. The parties desire to engage in the ENE process before incurring the fees and costs
associated with filing a responsive pleading and any associated opposition and reply briefs. The

1 parties agree that conserving all possible resources for settlement at the ENE conference would
2 further the goals of judicial economy, control of the Court's docket, and an inexpensive
3 determination of the case. Specifically, the extension requested is for a limited and reasonable
4 amount of time. Further, ordering Defendant to proceed with filing a responsive pleading would
5 result in an unnecessary expenditure of resources that may impede the resolution of this matter
6 through settlement. As a result, the parties stipulate to extend the deadline for Defendant to file its
7 responsive pleading to 14 days after the parties participate in the ENE conference. This request is
8 made in good faith and not to cause unnecessary delay.

9 Dated: October 13, 2016

Dated: October 13, 2016

10 Respectfully submitted,

Respectfully submitted,

12 /s/ Michael P. Balaban

13 **LAW OFFICES OF MICHAEL P.**
BALABAN
14 MICHAEL P. BALABAN, ESQ.

15 Attorneys for Plaintiff
ANNALISA CONNELLY

/s/ Wendy M. Krincek

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WENDY MEDURA KRINCEK, ESQ.
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16 Attorneys for Defendants
17 UNITED HEALTH SERVICES, INC., UHS OF
18 DELAWARE, INC., and VALLEY HEALTH
19 SYSTEM, LLC

20 IT IS SO ORDERED


21 UNITED STATES MAGISTRATE JUDGE

22 DATED: October 17, 2016

23 Firmwide:143339180.1 069080.1097